

# **EXHIBIT A**

McBay v. Harrison County, Mississippi, by and through its Board of Supervisors, et al  
Videotaped deposition of: Morgan Lee Thompson

August 14, 2009

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
Southern Division

\*\*\*\*\*

GARY BRICE McBAY,

\*

Plaintiff,

\*

v.

\*

Civil Action No.

HARRISON COUNTY, MISSISSIPPI \*

1:07CV1205-LG-RHW

BY AND THROUGH ITS BOARD OF \*

SUPERVISORS, et al., \*

Defendants. \*

COPY

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VIDEO-RECORDED DEPOSITION OF

MORGAN THOMPSON

August 14, 2009

11:48 a.m. - 12:45 p.m.

Hopewell, Virginia

REPORTED BY: Kurt D. Hruneni; CCR-VA

1 verbal commands."

2 A Yes, sir.

3 Q You asked him to remove his clothing. He  
4 indicated that he wouldn't "get naked," and took an  
5 aggressive posture towards you with closed fists.

6 Where is this going on? Where is he taking  
7 -- what part of the jail is he in or where is he  
8 located when he's taking this aggressive, closed fist  
9 posture towards you?

10 A In the shower area, where we dress out  
11 everybody.

12 Q "Deputy Thompson moved toward McBay to  
13 employ a soft empty hand control hold. McBay grabbed  
14 Deputy Thompson by the shirt and struck Deputy Thompson  
15 approximately 2 times on the side of the head with a  
16 closed fist."

17 During the attack, you felt you were in  
18 physical danger and returned multiple blows with closed  
19 fists to the head and face area of McBay.

20 A That's not correct. I didn't -- I had Teel  
21 write this report out for me, because I was busy doing  
22 property.

23 Q All right. What's not correct about it?

24 A The soft empty hand control, however he put  
25 it in there. I didn't do that. I had reached out the

1 people to enter into the computers. And Teel offered,  
2 and I took him up on it.

3 Q All right. Is that an accepted procedure,  
4 or was that an accepted procedure at the jail, to do  
5 reports for each other?

6 A Yes, sir.

7 Q Was that in writing? I mean, was that  
8 authorized --

9 A Not in writing. No.

10 Q -- by your supervisors?

11 A No. It was just -- it was kind of assumed  
12 that it was okay to do. I mean, nobody had any  
13 problems with it. I had to go home to my kids. I  
14 don't want to stay there an extra two hours, you know.  
15 So he offered to do it for me, and I let him do it.

16 Q Did he witness what happened? Teel?

17 A No, sir. No, sir.

18 Q He just took what you told him?

19 A Yes, sir. Now, he had heard. He had  
20 heard, because we had an open spot in the side of the  
21 shower, like a little pass-through, where we could hand  
22 clothes and whatnot through.

23 And he had heard the verbal exchange, but  
24 he didn't know anything about the physical exchange.

25 Q So as I understand it then, it was you and